

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

DOCKET NO.: 04- 11572 JLT

\_\_\_\_\_  
SUSAN COONEY,  
Plaintiff,

v.

\_\_\_\_\_  
SAYBROOK GRADUATE SCHOOL AND  
RESEARCH CENTER and MAUREEN  
O'HARA, Individually,  
Defendants.

**AFFIDAVIT OF GRACE V. BACON GARCIA**

I, Grace V. Bacon Garcia, do hereby depose as follows:

1. I appear as counsel of record for the defendants, Saybrook Graduate School and Research Center ("Saybrook") and Maureen O'Hara ("O'Hara").
2. I am licensed to practice before the Courts of this Commonwealth, including this U.S. District Court for the District of Massachusetts.
3. I submit this Affidavit in support of Defendants' Motion for Summary Judgment.
4. Attached as Exhibit 1 is a true and accurate copy of plaintiff's Amended Civil Complaint in this action.
5. Attached as Exhibit 2 is true and accurate copy of relevant portions of Saybrook 1994-1995 Interim Catalog.
6. Attached as Exhibit 3 are true and accurate copies of January 18, 1995 and April 26, 1995 Offers of Admission to Saybrook Institute signed by Susan Cooney.
7. Attached as Exhibit 4 are true and accurate copies of relevant portions of Susan Cooney's deposition transcript from both Volume 1 and Volume 2.

8. Attached as Exhibit 5 is true and accurate copy of correspondence dated October 20, 2004 from Dr. Richard Monahan, Board of Registration of Psychologists.
9. Attached as Exhibit 6 are true and accurate copies of relevant portions of Dr. Karen Schwartz's deposition transcript.
10. Attached as Exhibit 7 are true and accurate copies of relevant portions of Dr. Maureen O'Hara's deposition transcript.
11. Attached as Exhibit 8 are true and accurate copies of relevant portions of Dr. William Bruff's deposition transcript.
12. Attached as Exhibit 9 is true and accurate copy of correspondence dated September 15, 2003 from Susan Cooney to Attorney Michael Vartain.
13. Attached as Exhibit 10 are true and accurate copies of relevant portions of Dr. Ruth Richard's deposition transcript.
14. Attached as Exhibit 11 are true and accurate copies of Saybrook's Answers to the Plaintiff's First Set of Interrogatories.
15. Attached as Exhibit 12 is a true and accurate copy of Peter W. v. San Francisco Unified Sch. Dt., 60 Cal. App. 3d 814 (1976).
16. Attached as Exhibit 13 is a true and accurate copy of Chevlin v. Los Angeles Comm. College Dt., 212 Cal. App. 3d. 382 (1989)
17. Attached as Exhibit 14 is a true and accurate copy of Continental Ins. Co. v. Bahnan, 1997 U.S. Dist. Lexis 23796 (D. Mass. 1997) (Gorton, J.).
18. Attached as Exhibit 15 are true and accurate copies of medical records produced by Dr. David Reisen.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 21ST DAY OF  
August, 2006

*/s/ Grace V. Bacon Garcia*

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Grace V. Bacon Garcia  
BBO # 640970